# EXHIBIT 35

# UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS EASTERN DIVISION

SERVICIOS FUNERARIOS GG, S.A. DE C.V.,

No. 23-cv-10684-IT

Plaintiff / Counterclaim-Defendant,

v.

ADVENT INTERNATIONAL CORPORATION,

Defendant / Counterclaim-Plaintiff.

# PLAINTIFF'S RESPONSES TO DEFENDANT'S FIRST SET OF INTERROGATORIES

Plaintiff Servicios Funerarios GG, S.A. DE C.V. ("Servicios Funerarios") responds, pursuant to Federal Rule of Civil Procedure 33 and Local Rule 33.1 of the First Set of Interrogatories (the "Interrogatories") propounded by Defendant Advent International Corporation ("Advent"), as follows:

# **General Objections and Reservations**

- 1. Servicios Funerarios objects to the Interrogatories to the extent that they purport to impose obligations beyond those set forth in the Federal Rules of Civil Procedure and the Local Rules of this Court.
- 2. Servicios Funerarios objects to the Interrogatories to the extent that they call for information that constitutes privileged attorney-client communications or that is otherwise protected from disclosure under the applicable privileges, laws, or rules.
- 3. Servicios Funerarios objects to the Interrogatories to the extent that they are overbroad, vague, not stated with reasonable particularity, and/or call for information that is not relevant to any party's claim or defense or is not proportional to the needs of the

case.

- 4. Servicios Funerarios objects to the Interrogatories to the extent that they are unduly burdensome, time-consuming, and extremely costly and, in that event, requests that Advent bear the cost of responding.
- 5. Servicios Funerarios objects to the Definitions of the Interrogatories to the extent they increase the burden of responding. For example, the definitions of "Servicios Funerarios" and "Gayosso" render the Interrogatories as overbroad.
- 6. Servicios Funerarios objects to the use of the term "Targeted Employees" because it is inaccurate, does not reflect the facts of this case, and is unduly prejudicial.
- 7. Servicios Funerarios responds based upon information reasonable available to it and expressly reserves the right to supplement these Responses, including by reason of continuing investigation and discovery.

# Responses to Interrogatories<sup>1</sup>

# **INTERROGATORY NO. 1**

Describe in detail, with reference to supporting documents, the complete factual and legal basis for identifying each of the Targeted Employees and for declining to identify Carlos Peña in the Criminal Complaint.

# **RESPONSE**:

As noted above, objection to the term "Targeted Employees," including because it mischaracterizes the nature of the criminal proceedings in Mexico.

The factual basis for identifying Enrique Pani Bano and Carlos Alfredo Paz Perez in the June 2, 2022 Criminal Complaint was their execution of the SPA on behalf of

<sup>&</sup>lt;sup>1</sup> Each General Objection or Reservation shall be deemed incorporated into the response and objections to each specific Interrogatory.

Gayosso. The factual basis for identifying Enrique Pani Bano, Carlos Alfredo Paz Perez, Carlos Lukac Ostreche, James Westra, and Alejandro Sosa Hernandez in the October 5, 2022 supplemental statement includes that, as employees or agents of Advent or of its related or affiliated entities, they were involved in the sale, the operation, or financial reporting of Gayosso, and their possible direct or indirect participation in the wrongful conduct set forth in the criminal complaint should be investigated by the Public Prosecutor's Office. More specifically:

- Enrique Pani Bano was an Advent Managing Director and the Chairman of
  Gayosso's Board, in addition to executing the SPA as a representative of
  Gayosso. He was also a lead negotiator on the sale of Gayosso's shares and
  was believed to have knowledge of Gayosso's operations, business
  practices, and financial reporting.
- Alfredo Paz Perez was a Senior Director and co-head of the Portfolio Support Group, Latin America, for Advent International PE Advisors S.C.
  He was an active Board Member of Gayosso since 2014 and a member of the Finance and Auditing Committees. In addition to executing the SPA as a representative of Gayosso, he was a lead negotiator on the sale of Gayosso's shares and was believed to have knowledge of Gayosso's operations, business, practices, and financial reporting.
- Carlos Lukac Ostreche was CEO of Gayosso from October 2011 to January
   2021. He was a member of the Executive Committee of Gayosso. He had knowledge of Gayosso's operations, business, practices, and financial reporting.

- Alejandro Sosa Hernandez was Director of Operations of Gayosso from January 2015 to June 2021. He was a member of the Executive Committee of Gayosso. He had knowledge of Gayosso's operations, business, practices, and financial reporting.
- James Westra was a Managing Partner of AIC and the General Counsel of AIC. He was a lead negotiator on the sale of Gayosso's shares, including with respect to the false representations made in the SPA.

Additional factual basis is the information contained in documents being produced and this response will be supplemented to provide the Bates numbers for such documents once production is made.

The Criminal Complaint did not purport to state a legal basis for identifying the employees since, under the Mexican criminal justice system, it is not the role of a complainant such as Servicios Funerarios to determine whether a person or entity should be charged with a crime or be arrested. Rather, it is the role of the Public Prosecutor's Office to conduct the appropriate investigation of the matters asserted in a criminal complaint to determine whether crimes were committed and, if so, to then take what in the prosecutor's discretion are the appropriate steps, including bringing the matter before the criminal courts and seeking arrest warrants. Here, upon conducting an independent investigation of the fraud perpetrated by AIC, the Public Prosecutor's Office made the independent decision to proceed against the employees pursuant to Article 21 of the Mexican Constitution. A criminal court judge, upon review of the conclusions of the investigation performed by the Public Prosecutor, issued the arrest warrants for the employees.

Servicios Funerarios did not identify Carlos Peña in the Criminal Complaint because it did not believe that he participated in the wrongful conduct set forth in the Criminal Complaint.

#### **INTERROGATORY NO. 2**

State whether You contend, as to each of the Targeted Employees, that the issuance of the Arrest Warrants complied with the requirements of Mexican law, and describe in detail, with reference to supporting documents, the complete factual and legal basis for Your contention.

#### **RESPONSE:**

As noted above, objection to the term "Targeted Employees," including because it mischaracterizes the nature of the criminal proceedings in Mexico.

Yes, as to each of the employees.

Our contention is based on the proceedings and conclusions of the Public Prosecutor and the Mexican courts, and on related documents which, to the extent they are in the possession, custody, or control of Servicios Funerarios will be produced pursuant to Advent's document requests and, upon production, this response will be supplemented to identify the relevant documents by Bates numbers.

In accordance with Articles 141 and 142 of the National Code of Criminal Procedures, after conducting an independent investigation the Public Prosecutor can exercise discretion to request, in a private hearing, that a Judge issue an arrest warrant. Based upon available information, on October 7, 2022, the Public Prosecutor, after conducting an independent investigation, requested such a hearing before a Judge, and, at that hearing, he presented the basis of the criminal fraud case against the employees. Based upon available information, the understanding is that the Judge determined that the Public Prosecutor had met the

requirements under Mexican law by providing evidence sufficient to prove the fraud committed by the employees (and AIC) against Servicios Funerarios and issued the arrest warrants against the employees.

Neither Servicios Funerarios nor its counsel attended or participated in the hearing before the Control Judge.

# **INTERROGATORY NO. 3**

Describe in detail, with reference to supporting documents, the circumstances surrounding the formation of Servicios Funerarios, including without limitation the purpose behind forming Servicios Funerarios; the persons responsible for its formation; and any involvement, input, or participation in any aspect of its formation by Carlos Peña, Octavio Trejo, or the El-Mann Family.

# **RESPONSE:**

Servicios Funerarios was formed as a corporation pursuant to Mexican law on January 22, 2020. The purpose behind the incorporation of Servicios Funerarios was for its purchase of the shares in Gayosso. The person responsible for the decision to incorporate Servicios Funerarios was Pablo Peña Vazquez. There was no involvement, input, or participation by Carlos Peña, Octavio Trejo, or the El-Mann Family in any aspect of the incorporation of Servicios Funerarios.

# **INTERROGATORY NO. 4**

Describe in detail, with reference to supporting documents, Servicios Funerarios' ownership structure, and to the extent it has changed over time, any prior ownership structure, including without limitation its current or former ultimate beneficial owner(s); any agreements or understandings concerning profit sharing, stock options, phantom interests, deferred compensation, or any other economic entitlements or benefits of any

kind; any current or former relationship with Banco Ve Por Más, SA Institución de Banca Múltiple, Grupo Financiero Ve Por Más, and the Trust Fideicomiso 666; and any other equity, ownership, or economic interests in Servicios Funerarios of any kind.

# **RESPONSE:**

Servicios Funerarios' shares have at all times been owned by a trust established pursuant to Contrato de Fideicomiso de Administracion Number 682 and by Pablo Peña.

# **INTERROGATORY NO. 5**

Identify the names, addresses, and employment titles of each person with knowledge of the Gayosso Transaction and describe in detail what knowledge You believe each identified person to have.

# **RESPONSE:**

The following individuals have knowledge responsive to this interrogatory:

Names	Addresses	<b>Employment titles</b>	Basis of
			Knowledge
Advent			
International			
Patrice Etlin	Av. Brig. Faria Lima 3311, 9°	Managing Partner	Participated in the
	· ·		approval of the sale
	andar, 04538-133		of Gayosso as part
	São Paulo, SP,		of the Latam
	Brazil		Advisory
			Investment
			Committee.
			Participated in the
			investment
			committees where
			the transaction was
			presented and
			discussed several
			times. Participated
			in the portfolio
			review sessions

Names	Addresses	<b>Employment titles</b>	Basis of
			Knowledge
			where the
			performance of the
			company was
			discussed
Juan Pablo Zucchini	Av. Brig. Faria	Managing Partner	Participated in the
	Lima 3311, 9°		approval of the sale
	andar, 04538-133		of Gayosso as part
	São Paulo, SP,		of the Latam
	Brazil		Advisory
			Investment
			Committee.
			Participated in the
			investment
			committees where
			the transaction was
			presented and
			discussed several
			times. Participated
			in the portfolio
			review sessions
			where the
			performance of the
			company was
			discussed
Mario Malta	Av. Brig. Faria	Managing Director	Participated in the
	Lima 3311, 9°		approval of the sale
	andar, 04538-133		of Gayosso as part
	São Paulo, SP,		of the Latam
	Brazil		Advisory
			Investment
			Committee.
			Participated in the
			investment
			committees where
			the transaction was
			presented and
			discussed several
			times. Participated

Names	Addresses	<b>Employment titles</b>	Basis of Knowledge
Brenno Raiko	Av. Brig. Faria Lima 3311, 9° andar, 04538-133 São Paulo, SP, Brazil	Managing Director	in the portfolio review sessions where the performance of the company was discussed  Participated in the approval of the sale of Gayosso as part of the Latam Advisory Investment Committee. Participated in the investment committees where the transaction was presented and discussed several times. Participated
Wilson Rosa	Av. Brig. Faria Lima 3311, 9° andar, 04538-133 São Paulo, SP, Brazil	Managing Director	in the portfolio review sessions where the performance of the company was discussed Participated in the approval of the sale of Gayosso as part of the Latam Advisory Investment Committee. Participated in the investment committees where the transaction was presented and

Names	Addresses	<b>Employment titles</b>	Basis of
			Knowledge
			discussed several
			times. Participated
			in the portfolio
			review sessions
			where the
			performance of the
			company was
			discussed
Manuel Garcia	Avenida Calle 82	Managing Director	Participated in the
Podesta	#10-33, Oficina		approval of the sale
	702, Bogotá		of Gayosso as part
	110221, Colombia		of the Latam
	·		Advisory
			Investment
			Committee.
			Participated in the
			investment
			committees where
			the transaction was
			presented and
			discussed several
			times. Participated
			in the portfolio
			review sessions
			where the
			performance of the
			company was
			discussed
Mauricio Salgar	Avenida Calle 82	Managing Director	Participated in the
	#10-33, Oficina		approval of the sale
	702, Bogotá		of Gayosso as part
	110221, Colombia		of the Latam
	,		Advisory
			Investment
			Committee.
			Participated in the
			investment
			committees where
			Committees where

Names	Addresses	<b>Employment titles</b>	Basis of
			Knowledge
			the transaction was
			presented and
			discussed several
			times. Participated
			in the portfolio
			review sessions
			where the
			performance of the
			company was
			discussed
Enrique Pani	NA	Former Managing	Chairman of the
		Director	Board of Directors
			of Gayosso at the
			time of closing.
			Partner in charge
			within Advent of
			Gayosso. Led the
			sale of Gayosso to
			Servicios Funerarios
			Participated in the
			approval of the sale
			of Gayosso as part
			of the Latam
			Advisory
			Investment
			Committee.
			Participated in the
			investment
			committees where
			the transaction was
			presented and
			discussed several
			times. Participated
			in the portfolio
			review sessions
			where the
			performance of the

Carlos Alfredo Paz  Campos Eliseos 345, floor 14, Polanco, 11560, Mexico City, Mexico  Carlos Alfredo Paz  Campos Eliseos 345, floor 14, Polanco, 11560, Mexico City, Mexico  Co-Head of Portfolio Support Latam  Responsible together with Mr. Pani of the performance and sale of Gayosso within Advent. Led the sale of Gayosso to Servicios Funerarios GG. Participated in the investment committees where the transaction was presented and discussed several	Names	Addresses	<b>Employment titles</b>	Basis of
Carlos Alfredo Paz  Campos Eliseos 345, floor 14, Polanco, 11560, Mexico City, Mexico  Campos Eliseos 345, floor 14, Polanco, 11560, Mexico City, Mexico  Co-Head of Co-Head of Gayosso since 2014 until closing. Responsible together with Mr. Pani of the performance and sale of Gayosso within Advent. Led the sale of Gayosso to Servicios Funerarios GG. Participated in the investment committees where the transaction was presented and discussed several				Knowledge
Carlos Alfredo Paz  Campos Eliseos 345, floor 14, Polanco, 11560, Mexico City, Mexico  Campos Eliseos 345, floor 14, Polanco, 11560, Mexico City, Mexico  Co-Head of Portfolio Support Latam  Responsible together with Mr. Pani of the performance and sale of Gayosso within Advent. Led the sale of Gayosso to Servicios Funerarios GG. Participated in the investment committees where the transaction was presented and discussed several				
345, floor 14, Polanco, 11560, Mexico City, Mexico  Mexico  Co-Head of Portfolio Support Latam  Responsible together with Mr. Pani of the performance and sale of Gayosso within Advent. Led the sale of Gayosso to Servicios Funerarios GG. Participated in the investment committees where the transaction was presented and discussed several				
Polanco, 11560, Mexico City, Mexico  M	Carlos Alfredo Paz	_		
Mexico City, Mexico  Latam  Responsible together with Mr. Pani of the performance and sale of Gayosso within Advent. Led the sale of Gayosso to Servicios Funerarios GG. Participated in the investment committees where the transaction was presented and discussed several				
Mexico  together with Mr. Pani of the performance and sale of Gayosso within Advent. Led the sale of Gayosso to Servicios Funerarios GG. Participated in the investment committees where the transaction was presented and discussed several		Polanco, 11560,	Portfolio Support	until closing.
Pani of the performance and sale of Gayosso within Advent. Led the sale of Gayosso to Servicios Funerarios GG. Participated in the investment committees where the transaction was presented and discussed several		Mexico City,	Latam	Responsible
performance and sale of Gayosso within Advent. Led the sale of Gayosso to Servicios Funerarios GG. Participated in the investment committees where the transaction was presented and discussed several		Mexico		together with Mr.
sale of Gayosso within Advent. Led the sale of Gayosso to Servicios Funerarios GG. Participated in the investment committees where the transaction was presented and discussed several				Pani of the
within Advent. Led the sale of Gayosso to Servicios Funerarios GG. Participated in the investment committees where the transaction was presented and discussed several				performance and
the sale of Gayosso to Servicios Funerarios GG. Participated in the investment committees where the transaction was presented and discussed several				sale of Gayosso
to Servicios Funerarios GG. Participated in the investment committees where the transaction was presented and discussed several				within Advent. Led
Funerarios GG. Participated in the investment committees where the transaction was presented and discussed several				the sale of Gayosso
Participated in the investment committees where the transaction was presented and discussed several				to Servicios
investment committees where the transaction was presented and discussed several				Funerarios GG.
committees where the transaction was presented and discussed several				Participated in the
the transaction was presented and discussed several				investment
presented and discussed several				committees where
discussed several				the transaction was
				presented and
times. Participated				discussed several
				times. Participated
in the portfolio				in the portfolio
review sessions				review sessions
where the				where the
performance of the				performance of the
company was				
discussed				discussed
Ariel Blumenkranc Campos Eliseos Managing Director After Pani left	Ariel Blumenkranc	Campos Eliseos	Managing Director	After Pani left
345, floor 14, Advent (August		345, floor 14,		Advent (August
Polanco, 11560, 2021), Mr.		Polanco, 11560,		2021), Mr.
Mexico City, Blumenkranc took		Mexico City,		Blumenkranc took
Mexico over leading		•		over leading
Advent's Mexico				Advent's Mexico
office. Mr.				office. Mr.
Blumenkranc has				Blumenkranc has
knowledge about				knowledge about
the sale of Gayosso				
to Servicios				_

Names	Addresses	<b>Employment titles</b>	Basis of
			Knowledge
			Funerarios and the
			sale to other bidders
			in the past
Carlos Peña	NA	Former Director	Participated in the
			sale of Gayosso to
			Servicios
			Funernarios.
			Assisted to the
			Board of Directors
			of Gayosso since
			May 2019
Veronica Stenner	NA	Former Associate	Participated in the
			investment
			committees where
			the transaction was
			presented and
			discussed several
			times. Participated
			in the portfolio
			review sessions
			where the
			performance of the
			company was
			discussed.
			Participated in the
			sale of Gayosso to
			Servicios
			Funerarios.
David Mussafer	Prudential Tower	Managing Partner	Participated in the
	800 Boylston Street,		approval of the sale
	Boston, MA 02199-		of Gayosso as part
	8069, USA		of the Investment
			Committee.
			Participated in the
			investment
			committees where
			the transaction was
			presented and

Names	Addresses	<b>Employment titles</b>	Basis of
			Knowledge
			discussed several
			times
John Maldonado	Prudential Tower	Managing Partner	Participated in the
	800 Boylston Street,		approval of the sale
	Boston, MA 02199-		of Gayosso as part
	8069, USA		of the Investment
			Committee.
			Participated in the
			investment
			committees where
			the transaction was
			presented and
			discussed several
			times
Chris Egan	Prudential Tower	Managing Partner	Participated in the
	800 Boylston Street,		approval of the sale
	Boston, MA 02199-		of Gayosso as part
	8069, USA		of the Investment
			Committee.
			Participated in the
			investment
			committees where
			the transaction was
			presented and
			discussed several
			times
James Westra	Prudential Tower	Managing Partner	Approved the sale
	800 Boylston Street,	and Chief Legal	of Gayosso.
	Boston, MA 02199-	Officer	Negotiated and
	8069, USA		approved the Reps
	0009, 0211		and Guarantees of
			the SPA. Negotiated
			and signed the
			Seller's Guarantee
Richard Kane	Prudential Tower	Managing Director	Approved the sale
I I I I I I I I I I I I I I I I I I I	800 Boylston Street,	and COO	of Gayosso
	Boston, MA 02199-		01 04,0550
	8069, USA		
	0007, USA		

Names	Addresses	<b>Employment titles</b>	Basis of
			Knowledge
Eileen Sivolella	Prudential Tower 800 Boylston Street, Boston, MA 02199- 8069, USA	Managing Director and CFO	Approved the sale of Gayosso
Heather Zuzenak	Prudential Tower 800 Boylston Street, Boston, MA 02199- 8069, USA	Chief Compliance Officer	Approved the sale of Gayosso
Grupo Gayosso			
Carlos Lukac	NA	Former CEO	Participated in the management presentations with Servicios Funerarios. Led the sale process internally. Participated in some meetings with Pablo Peña
Octavio Trejo	NA	Former CFO	Participated in the management presentations with Servicios Funerarios. Participated in the data room and SPA. Participated in some meetings with Pablo Peña
Ruben Saucedo	NA	Former Legal Director	Participated in the data room and SPA
Everardo Garcia	NA	Former Sales Director	Participated in the management presentations with Servicios Funerarios

Names	Addresses	<b>Employment titles</b>	Basis of
			Knowledge
Alejandro Sosa	NA	Former Operations	Participated in the
		Director	management
			presentations with
			Servicios Funerarios
Oscar Chavez	NA	Former Marketing	Participated in the
		and Planning	management
		Director	presentations with
			Servicios Funerarios
Alejandro	NA	Former IT Director	Participated in the
Kourchenko			management
			presentations with
			Servicios Funerarios
Luis Arturo Flores	NA	Former HHRR	Participated in the
		Director	management
			presentations with
			Servicios Funerarios
Ricardo Lemus	James Sullivan 71,	Funeral Homes	Participated in the
	San Rafael,	Director	management
	Cuauhtemoc,		presentations with
	06470, Mexico City,		Servicios Funerarios
	Mexico		
Fabiola Garcia	NA	Former Finance	Participated in the
		Planning Director	data room
Chi.			
Citigroup	<b>&gt;</b> 7.4	1.5	
Lorenzo Massart	NA	Managing Director	Advised Advent on
<b>Ν</b> //	N. 4		the sale of Gayosso
Mijares, Angoitia, C	<u> </u>	D.	A 1 * 1 A 1
Patricio Trad	Javier Barros Sierra	Partner	Advised Advent in
	540, 4to piso, Park		the sale of Gayosso
	Plaza I, Colonia		during the SPA
	Santa Fe, Alcaldía		process
	Álvaro Obregón,		
	C.P. 01210, Ciudad		
. 5.11	de México.		
Juan Pablo	Javier Barros Sierra	Associate	Advised Advent in
Betancourt	540, 4to piso, Park		the sale of Gayosso

Names	Addresses	<b>Employment titles</b>	Basis of Knowledge
	Plaza I, Colonia		during the SPA
	Santa Fe, Alcaldía		process
	Álvaro Obregón,		process
	C.P. 01210, Ciudad		
	de México.		
Pedro García	Javier Barros Sierra		Advised Advent in
Ampudia	540, 4to piso, Park		the sale of Gayosso
	Plaza I, Colonia		during the SPA
	Santa Fe, Alcaldía		process
	Álvaro Obregón,		
	C.P. 01210, Ciudad		
	de México.		
Fernando Molina	Javier Barros Sierra		Advised Advent in
Ostos	540, 4to piso, Park		the sale of Gayosso
	Plaza I, Colonia		during the SPA
	Santa Fe, Alcaldía		process
	Álvaro Obregón,		
	C.P. 01210, Ciudad		
	de México.		
Mauricio Guals	Javier Barros Sierra		Advised Advent in
Pons	540, 4to piso, Park		the sale of Gayosso
	Plaza I, Colonia		during the SPA
	Santa Fe, Alcaldía		process
	Álvaro Obregón,		
	C.P. 01210, Ciudad		
	de México.		
Llaguno, Name y M	oreno		
Francisco Moreno	Bosque de Duraznos	Partner	Advised Advent and
Bazán	67-101 B		Gayosso during the
	Bosques de las		SPA process and
	Lomas		M&A process as
	11700 Ciudad de		Gayosso's corporate
	México		external legal
			counsel
Leticia Espinosa	Bosque de Duraznos	Associate	Advised Advent and
	67-101 B		Gayosso during the
	Bosques de las		SPA process and
	Lomas		M&A process as

Names	Addresses	<b>Employment titles</b>	Basis of
			Knowledge
	11700 Ciudad de		Gayosso's corporate
	México		external legal
			counsel
Mexcap Partners			
Pablo Peña	Antonio Dovali	Managing Partner	Advised Servicios
	Jaime 70, Torre B,		Funerarios in the
	Piso 10, Zedec	Former Partner of	acquisition of
	Santa Fe	Execution Finance	Gayosso and the
	Alvaro Obregón,	(ExeFin)	financing for the
	01210, Mexico City,	, ,	acquisition
	Mexico		1
Mariana González	Antonio Dovali	Managing Director	Advised Servicios
	Jaime 70, Torre B,		Funerarios in the
	Piso 10, Zedec	Former Executive	acquisition of
	Santa Fe	Director of	Gayosso and Sale
	Alvaro Obregón,	Execution Finance	and the financing
	01210, Mexico City,	(ExeFin)	for the acquisition
	Mexico	,	•
Miguel Rizo Patrón	Antonio Dovali	Managing Director	Advised Servicios
	Jaime 70, Torre B,		Funerarios in the
	Piso 10, Zedec	Former Director of	acquisition of
	Santa Fe	Execution Finance	Gayosso and the
	Alvaro Obregón,	(ExeFin)	financing for the
	01210, Mexico City,		acquisition
	Mexico		
<b>HSBC</b> (Main Lende	r and structuring ager	nt)	
Mónica Macia	452 Fifth Avenue	Managing Director-	Advised
	New York, NY	Loan Syndications	Gayosso/HSBC for
	10018, USA		the syndicated loan
			to substitute the
			CPPIB's financing
Guillermo Andrade	452 Fifth Avenue	Vice President-	Advised
	New York, NY	Loan Syndications	Gayosso/HSBC for
	10018, USA	-	the syndicated loan
			to substitute the
			CPPIB's financing

Names	Addresses	<b>Employment titles</b>	Basis of Knowledge
Marula Solsa	452 Fifth Avenue New York, NY 10018, USA  Analyst- Loan Syndications		Advised Gayosso/HSBC for the syndicated loan to substitute the CPPIB's financing
Juan Carlos Pérez Carmona	Av. Paseo de la Reforma 347 México D.F. 06500	Reforma 347 Commercial	
Citlali Guzman	Av. Paseo de la Reforma 347 México D.F. 06500	Vice President Commercial Banking Origination	Advised Gayosso/HSBC for the syndicated loan to substitute the CPPIB's financing
Estefania Michel	Av. Paseo de la Reforma 347 México D.F. 06500	Analyst- Commercial Banking Origination	Advised Gayosso/HSBC for the syndicated loan to substitute the CPPIB's financing
Victor Coalla	Av. Paseo de la Reforma 347 México D.F. 06500	Head Corporate Banking	Advised Gayosso/HSBC for the syndicated loan to substitute the CPPIB's financing
Antonio Sañudo	Av. Paseo de la Reforma 347 México D.F. 06500	Director Corporate Banking	Advised Gayosso/HSBC for the syndicated loan to substitute the CPPIB's financing
David Durán	Av. Paseo de la Reforma 347 México D.F. 06500	Relationship Manager Corporate Banking	Advised Gayosso/HSBC for the syndicated loan to substitute the CPPIB's financing
Ali Lam	Av. Paseo de la Reforma 347 México D.F. 06500	Relationship Manger Support Corporate Banking	Advised Gayosso/HSBC for the syndicated loan

Names	Addresses Employment titles		Basis of Knowledge
			to substitute the CPPIB's financing
Creel, García-Cuélla	ar, Aiza y Enríquez		
Pedro Velasco  Emilio Aarún	Torre Virreyes Partner  Pedregal 24, Floor 24th, Molino del Rey, Mexico City 11040  Torre Virreyes Partner		Lenders' Legal Counsel for the syndicated loan  Lenders' Legal
Zimilo i ku un	Pedregal 24, Floor 24th, Molino del Rey, Mexico City 11040		Counsel for the syndicated loan
Victor Gallegos	Torre Virreyes Counsel Pedregal 24, Floor 24th, Molino del Rey, Mexico City 11040		Lenders' Legal Counsel for the syndicated loan
Martín Pavón	Torre Virreyes Associate Pedregal 24, Floor 24th, Molino del Rey, Mexico City 11040		Lenders' Legal Counsel for the syndicated loan
Javier Lavalle	Torre Virreyes Pedregal 24, Floor 24th, Molino del Rey, Mexico City 11040	Associate	Lenders' Legal Counsel for the syndicated loan
Finance Law Adviso	ry Group		
Boris Otto	Calle Bernardo de Gálvez 135, Lomas - Virreyes, IV Sección,	Partner	Gayosso's Legal Counsel for the syndicated loan

Names	Addresses	<b>Employment titles</b>	Basis of Knowledge	
	Miguel Hidalgo, 11000 Ciudad de México, CDMX			
Adrian Cabrero	Calle Bernardo de Gálvez 135, Lomas - Virreyes, IV Sección, Miguel Hidalgo, 11000 Ciudad de México, CDMX	Partner	Gayosso's Legal Counsel for the syndicated loan	
Salvador Padilla	Calle Bernardo de Gálvez 135, Lomas - Virreyes, IV Sección, Miguel Hidalgo, 11000 Ciudad de México, CDMX	Associate	Gayosso's Legal Counsel for the syndicated loan	
Mariana Montaño	Calle Bernardo de Gálvez 135, Lomas - Virreyes, IV Sección, Miguel Hidalgo, 11000 Ciudad de México, CDMX	Associate	Gayosso's Legal Counsel for the syndicated loan	
Ritch Mueller				
Alejandra Eheverría González	Av. Pedregal No. 24 Piso 10, Molino del Rey, 11040, CDMX	Legal Counsel	Advised Advent, Gayosso and CPPIB for the release of guarantees granted under the CPPIB financing	
Sarur Servicios Inte	grales			
Raúl Sánchez	Paseo de la Reforma 2345-101, Col. Lomas de Reforma, Miguel Hidalgo, CP. 11930, CDMX	Partner	Advised Servicios Funerarios in Gayosso's acquisition and sale and leaseback with Fibra UNO	

Names	Addresses	<b>Employment titles</b>	Basis of
			Knowledge
Miranda Bandala	Paseo de la Reforma	Counsel	Advised Servicios
	2345-101,		Funerarios in
	Col. Lomas de		Gayosso's
	Reforma,		acquisition and sale
	Miguel Hidalgo,		and leaseback with
	CP. 11930, CDMX		Fibra UNO
Ivan Apatenco	Paseo de la Reforma	Counsel	Advised Servicios
	2345-101,		Funerarios in
	Col. Lomas de		Gayosso's
	Reforma,		acquisition and sale
	Miguel Hidalgo,		and leaseback with
	CP. 11930, CDMX		Fibra UNO
Jimena Rodriguez	Paseo de la Reforma	Counsel	Advised Servicios
	2345-101,		Funerarios in
	Col. Lomas de		Gayosso's
	Reforma,		acquisition and sale
	Miguel Hidalgo,		and leaseback with
	CP. 11930, CDMX		Fibra UNO
<b>Pontones &amp; Ledesn</b>	ทด		
1 ontones & Leucsi	iiu		
Arturo Ledesma	Tennyson 17, Piso	Partner	Advised Servicios
		Partner	Advised Servicios Funerarios for
Arturo Ledesma	Tennyson 17, Piso	Partner	
Arturo Ledesma	Tennyson 17, Piso 2. Col. Polanco	Partner	Funerarios for
Arturo Ledesma	Tennyson 17, Piso 2. Col. Polanco Chapultepec, Del.	Partner	Funerarios for Gayosso's real
Arturo Ledesma	Tennyson 17, Piso 2. Col. Polanco Chapultepec, Del. miguel Hidalgo	Partner	Funerarios for Gayosso's real estate properties due
Arturo Ledesma	Tennyson 17, Piso 2. Col. Polanco Chapultepec, Del. miguel Hidalgo	Partner	Funerarios for Gayosso's real estate properties due diligence required
Arturo Ledesma	Tennyson 17, Piso 2. Col. Polanco Chapultepec, Del. miguel Hidalgo	Partner	Funerarios for Gayosso's real estate properties due diligence required for Gayosso's sale
Arturo Ledesma	Tennyson 17, Piso 2. Col. Polanco Chapultepec, Del. miguel Hidalgo	Partner	Funerarios for Gayosso's real estate properties due diligence required for Gayosso's sale and leaseback
Arturo Ledesma	Tennyson 17, Piso 2. Col. Polanco Chapultepec, Del. miguel Hidalgo	Partner	Funerarios for Gayosso's real estate properties due diligence required for Gayosso's sale and leaseback transaction and
Arturo Ledesma	Tennyson 17, Piso 2. Col. Polanco Chapultepec, Del. miguel Hidalgo	Partner	Funerarios for Gayosso's real estate properties due diligence required for Gayosso's sale and leaseback transaction and guarantees of
Arturo Ledesma	Tennyson 17, Piso 2. Col. Polanco Chapultepec, Del. miguel Hidalgo	Partner	Funerarios for Gayosso's real estate properties due diligence required for Gayosso's sale and leaseback transaction and guarantees of Gayosso's
Arturo Ledesma Ruiz	Tennyson 17, Piso 2. Col. Polanco Chapultepec, Del. miguel Hidalgo 11560 CDMX	Partner	Funerarios for Gayosso's real estate properties due diligence required for Gayosso's sale and leaseback transaction and guarantees of Gayosso's syndicated loan
Arturo Ledesma Ruiz	Tennyson 17, Piso 2. Col. Polanco Chapultepec, Del. miguel Hidalgo 11560 CDMX  Tennyson 17, Piso	Partner	Funerarios for Gayosso's real estate properties due diligence required for Gayosso's sale and leaseback transaction and guarantees of Gayosso's syndicated loan Advised Servicios
Arturo Ledesma Ruiz	Tennyson 17, Piso 2. Col. Polanco Chapultepec, Del. miguel Hidalgo 11560 CDMX  Tennyson 17, Piso 2. Col. Polanco	Partner	Funerarios for Gayosso's real estate properties due diligence required for Gayosso's sale and leaseback transaction and guarantees of Gayosso's syndicated loan Advised Servicios Funerarios for
Arturo Ledesma Ruiz	Tennyson 17, Piso 2. Col. Polanco Chapultepec, Del. miguel Hidalgo 11560 CDMX  Tennyson 17, Piso 2. Col. Polanco Chapultepec, Del.	Partner	Funerarios for Gayosso's real estate properties due diligence required for Gayosso's sale and leaseback transaction and guarantees of Gayosso's syndicated loan Advised Servicios Funerarios for Gayosso's real

Names	Addresses	<b>Employment titles</b>	Basis of Knowledge
			and leaseback
			transaction and
			guarantees of
			Gayosso's
			syndicated loan
Mancera- E&Y			Syndicated foun
Rafael Aguirre	Av. Ejército	Former Partner-	Advised Servicios
	Nacional 843 - B	Transaction	Funerarios for
	Piso 5 Col.	Services	Gayosso's financial
	Granada, Antara		due diligence for the
	Polanco, CDMX		acquisition,
	11520, México,		coordinated the
	, , , , , , , , , , , , , , , , , , , ,		labor and tax due
			diligence for the
			acquisition
José Luis Acosta	Av. Ejército	Transaction	Advised Servicios
	Nacional 843 - B	Services	Funerarios for
	Piso 5 Col.		Gayosso's financial
	Granada, Antara		due diligence for the
	Polanco, CDMX		acquisition,
	11520, México,		coordinated the
	, ,		labor and tax due
			diligence for the
			acquisition
Liliana Chong	Av. Ejército	Transaction	Advised Servicios
	Nacional 843 - B	Services	Funerarios for
	Piso 5 Col.		Gayosso's financial
	Granada, Antara		due diligence for the
	Polanco, CDMX		acquisition,
	11520, México,		coordinated the
			labor and tax due
			diligence for the
			acquisition
Fernando Escamilla	Av. Ejército	Partner- Transaction	Advised Servicios
	Nacional 843 - B	Tax	Funerarios on the
	Piso 5 Col.		tax structure for
	Granada, Antara		Gayosso's
			acquisition

Names	Names Addresses		Basis of Knowledge
	Polanco, CDMX 11520, México,		
Miguel Ibañez	Av. Ejército Nacional 843 - B Piso 5 Col. Granada, Antara Polanco, CDMX 11520, México,	Manager- Transaction Tax	Advised Servicios Funerarios on the tax structure for Gayosso's acquisition
Iván Pardo	Av. Ejército Nacional 843 - B Piso 5 Col. Granada, Antara Polanco, CDMX 11520, México,	Former Manager- Transaction Tax	Advised Servicios Funerarios on the tax structure for Gayosso's acquisition
Mario Arregoytia	Av. Ejército Nacional 843 - B Piso 5 Col. Granada, Antara Polanco, CDMX 11520, México,	Partner Audit	Reviewed the transaction for auditing purposes
Notaria 24 CDMX			
Marisol Sabater	Monte Líbano 960, Lomas de Chapultepec, Miguel Hidalgo, 11000	Lawyer	Notary for Gayosso's M&A, Gayosso's Syndicated Loan and Gayosso's Sale and Leaseback
Armando Gómez	Monte Líbano 960, Lomas de Chapultepec, Miguel Hidalgo, 11000	Lawyer	Notary for Gayosso's M&A, Gayosso's Syndicated Loan and Gayosso's Sale and Leaseback
Edgar Huerta	Monte Líbano 960, Lomas de Chapultepec, Miguel Hidalgo, 11000	Lawyer	Notary for Gayosso's M&A, Gayosso's Syndicated Loan

Names	Addresses	<b>Employment titles</b>	Basis of Knowledge	
			and Gayosso's Sale and Leaseback	
Miguel Anaya	Monte Líbano 960,	Lawyer	Notary for	
	Lomas de		Gayosso's M&A,	
	Chapultepec,		Gayosso's	
	Miguel Hidalgo,		Syndicated Loan	
	11000		and Gayosso's Sale	
			and Leaseback	
Fibra UNO				
Andre Elmann	Antonio Dovali	DG Fibra UNO	Analyzed and	
Arazi	Jaime 70 Samara		advised Fibra UNO	
	Torre B Piso 11		for Gayosso's sale	
	CDMX		and leaseback	
			transaction	
Gonzalo Robina	Antonio Dovali	DGA Fibra UNO	Analyzed and	
	Jaime 70 Samara		advised Fibra UNO	
	Torre B Piso 11		for Gayosso's sale	
	CDMX		and leaseback	
			transaction	
Pablo Gómez	Antonio Dovali	Head of Financial	Analyzed and	
	Jaime 70 Samara	Planning – FIBRA	advised Fibra UNO	
	Torre B Piso 11	UNO	for Gayosso's sale	
	CDMX		and leaseback	
			transaction	
Patricio Hernández	Antonio Dovali	M&A- FIBRA	Analyzed and	
	Jaime 70 Samara	UNO	advised Fibra UNO	
	Torre B Piso 11		for Gayosso's sale	
	CDMX		and leaseback	
			transaction	
Alejandro Chico	Antonio Dovali	Legal VP Fibra	Analyzed and	
	Jaime 70 Samara	UNO	advised Fibra UNO	
	Torre B Piso 11		for Gayosso's sale	
	CDMX		and leaseback	
			transaction	
СРРІВ				
David Colla	Managing Director	Madison Avenue	Analyzed potential	
		510, floor 15th, NY,	financing of the	
		10022, NY	transaction. Lender	

Names	Addresses	<b>Employment titles</b>	Basis of
			Knowledge
			of Gayosso at
			closing
Nils Schulze-	Senior Principal	Madison Avenue	Analyzed potential
Halberg		510, floor 15th, NY,	financing of the
		10022, NY	transaction. Lender
			of Gayosso at
			closing
Alberto Garrido		Madison Avenue	Analyzed potential
		510, floor 15th, NY,	financing of the
		10022, NY	transaction. Lender
			of Gayosso at
			closing
Anthony Hernandez		Madison Avenue	Analyzed potential
		510, floor 15th, NY,	financing of the
		10022, NY	transaction. Lender
			of Gayosso at
			closing
Shirley Shen		Madison Avenue	Analyzed potential
		510, floor 15th, NY,	financing of the
		10022, NY	transaction. Lender
			of Gayosso at
			closing

Servicios Funerarios reserves the right to amend this list as discovery progresses.

# **INTERROGATORY NO. 6**

Describe in detail, and with reference to supporting documents, all engagements, arrangements, or other interactions between Servicios Funerarios' and any auditor, accountant, or entity that provides auditing or accounting services, including without limitation any changes in Servicios Funerarios' engagement with any auditor, accountant, or entity that provides auditing or accounting services; the reasons for the change in auditor, accountant, or entity that provides auditing or accounting services; and any changes in Servicios Funerarios' auditing or accounting practices that Servicios Funerarios' has made

and the reasons for making each change, including without limitation any changes to Servicios Funerarios' revenue recognition and cost recognition practices. For the avoidance of doubt, this Interrogatory includes all engagements, arrangements, or other interactions between Gayosso and any auditor, accountant, or entity that provides auditing or accounting services subsequent to the January 2021 closing of the Gayosso Transaction.

#### **RESPONSE:**

Servicios Funerarios has no arrangements or supporting documents with any auditor, accountant, or entity that provides auditing or accounting services. Execution Finance entered into an agreement with EY on or about August 1, 2019, to perform financial due diligence of Gayosso (a copy which agreement will be produced):

Date	Provider	Service
January 10, 2019	EY	Financial, tax and social security due diligence for the acquisition of Grupo Gayosso.

Gayosso has had the following engagements for the provision of accounting or auditing services (a copy of each such agreement will be produced):

Date	Provider	Service
January 25, 2017	EY	Technical Memorandum for the implementation of
		IFRS and its impact on the financial statements for
		2016 and 2015
July 24, 2017	EY	Auditing of Grupo Gayosso for 2017, 2016 and 2015
		Auditing from some subsidiaries of Grupo Gayosso for
		2017, 2016 and 2015
		Elaboration of quarterly Cash Flow Statements in
		relation with the financing from CPPIB
August 8, 2017	EY	Auditing of the contributions to the Social Security
		system for 2017

Date	Provider	Service
September 11,	EY	Auditing of Grupo Gayosso for 2018
2018		Auditing from some subsidiaries of Grupo Gayosso for
		2018
		Elaboration of quarterly Cash Flow Statements in
		relation with the financing from CPPIB
March 27, 2019	EY	Implementation of the IFRS 16 related to leases
		Definition of new policy IFRS 9 regarding future losses
June 3, 2019	EY	Auditing of Grupo Gayosso for 2019
		Auditing from some subsidiaries of Grupo Gayosso for
		2019
		Elaboration of quarterly Cash Flow Statements in
		relation with the financing from CPPIB
June 18, 2020	EY	Review all documentation for the sale of the shares of
		Gayosso and the S&LB, including their impacts in the
		financial statements
July 22, 2020	EY	Auditing of Grupo Gayosso for 2020
		Auditing from some subsidiaries of Grupo Gayosso for
		2020
		Elaboration of quarterly Cash Flow Statements in
		relation with the financing from CPPIB
July, 2021	Deloitte	Advisory to analyze the costs associated with the
		revenues recognized under IFRS
October 15,	EY	Auditing of Grupo Gayosso for 2021
2021		Auditing from some subsidiaries of Grupo Gayosso for
		2021
		Elaboration of quarterly Cash Flow Statements in
		relation with the Syndicated loan
October 2021	EY	Auditing of the contributions to the social security
		system for 2021
October 2021	EY	Auditing of transfer pricing for 2021
December 2021	EY	Defense of the SAT claim of 2016 taxes
February 2,	EY	PRODECON controversy for the merger of Jardines
2022		del Tiempo with its parent company Grupo Gayosso
November 18,	PWC	Analysis of revenue recognition under IFRS
2022		
November 23,	Deloitte	Auditing of Grupo Gayosso for 2021 and 2022
2022		Auditing from some subsidiaries of Grupo Gayosso for
		2021 and 2022

Date	Provider	Service
		Elaboration of quarterly Cash Flow Statements in
		relation with the Syndicated loan
March 24, 2023	Deloitte	Defense of the SAT claim of 2016 taxes

# **INTERROGATORY NO. 7**

Identify the names, addresses, employment titles, dates of employment, and primary responsibilities of each person who is, or has ever been, an officer or executive of Servicios Funerarios, including without limitation (and regardless of whether they held the role of an officer or executive) all current and former roles held, and responsibilities performed, by Carlos Peña, Pablo Peña, and Octavio Trejo, as well as the first date on which Servicios Funerarios communicated with Carlos Peña, Pablo Peña, and Octavio Trejo regarding all current and former roles. For the avoidance of doubt, this Interrogatory includes the names, addresses, employment titles, and primary responsibilities of each person who is, or has ever been, an officer or executive of Gayosso subsequent to the January 2021 closing of the Gayosso Transaction.

#### **RESPONSE:**

Name	Position	Beginning	Termination	Responsibility	
		Date	Date		
CURRENT EMPLOYEES					
Carlos Peña	CEO	February 1,	December 2,	Define strategy and	
Vazquez		2021	2022	supervise day to day	
				operations	
Carlos Peña	Executive	December 2,		Lead public relations,	
Vazquez	President	2022		supervise execution of	
				the agreements at the	
				Board	

Name	Position	Beginning Date	Termination Date	Responsibility	
Juan Jesus	Deputy CEO	June 13, 2022	December 2,	Lead operations, define	
Rodriguez Garcia			2022	new products, execute	
				reorganization	
Juan Jesus	CEO	December 2,		Define strategy and	
Rodriguez Garcia		2022		supervise day to day	
				operations	
Midory Vazquez	Administrative	March 8, 2021	February 28,	Lead administration,	
Nava	Director		2023	client service, and	
				financial controlling	
Midory Vazquez	CFO	February 28,		Lead administration,	
Nava		2023		accounting, fiscal,	
				financial reporting and	
				controlling	
Ricardo Lemus	Operations	September 3,		Lead operation in	
Cazares	Director	1993		funeral homes,	
				cemeteries, and	
				mausoleums	
Maria Isela	СТО	February 15,		Lead software	
Montenegro Aranda		1995		developments, systems	
				maintenance, networks,	
				and IT applications	
Gabriela Cruz	Director de	February 23,		Lead collections,	
Romero	Gestion de	2015		purchasing department	
	Recursos			and client service	
Arnulfo Mejia	General	May 17, 2021		Lead legal department	
Caballero	Counsel			and security	
Jorge Leonardo	Commercial	January 30,		Lead pre-need sales	
Palomera Ruiz	Director	2023		nationwide	
Emilio de Leyva	Director of	April 11, 2023		Lead human resources	
Escobar	People,			department, design and	
	Projects and			implement processes,	
	Processes			certifications and	
EODINE ELEVIOR	PEG			projects	
FORMER EMPLOYEES					
Everardo Garcia	Commercial	February 8,	January 28,	Lead pre-need sales	
Moreno	Director	2011	2023	nationwide	

Name	Position	Beginning Date	Termination Date	Responsibility
Oscar Chavez	Planning and	August 5,	December	Design commercial
Chavez	Marketing	2013	31, 2021	offer, marketing
	Director			campaigns, and digital marketings
Luis Arturo Flores	Director of	May 16, 2012	May 19, 2023	Lead human resources
Cedeño	Human			department
	Resources			
Octavio Trejo	CFO	May 14, 2014	February 28,	Lead accounting,
Garcia			2023	financial reporting and
				fiscal. Before closing,
				also administration,
				legal, purchasing
				department, client
				service and financial
				controlling departments
Abigail Alejandro	Director of	January 5,	June 15, 2021	Lead constructions,
Sosa Hernandez	Operations	2015		projects, maintenance,
				logistics, security and
				cemetery operations
Alejandro	СТО	May 6, 2019	May 15, 2021	Lead software
Kourchenko Torres				developments, systems
				maintenance, networks,
				and IT applications

# **VERIFICATION**

I, Pablo Peña, hereby state that I am authorized to sign these Answers to Interrogatories on behalf of Servicios Funerarios GG, S.A. DE C.V., the subjects stated in the foregoing answers are not all within my personal knowledge, no one representative of Servicios Funerarios GG, S.A. DE C.V. has personal knowledge over all such subjects, I have assembled the answers by communicating with employees and/or agents of Servicios Funerarios GG, S.A. DE C.V., and I believe the answers and facts included herein are accurate and true to the best of my knowledge.

		PhA: U.
Date:	June 5, 2023	
_		Pahlo Peña

Dated: June 5, 2023

#### **BOIES SCHILLER FLEXNER LLP**

/s/ David Boies

David Boies 333 Main Street8765438uiyi

Armonk, NY 10504

Telephone: (914) 749-8200 Facsimile: (914) 749-8300

dboies@bsfllp.com

Carlos M. Sires Jason Hilborn 401 East Las Olas Blvd., Suite 1200 Fort Lauderdale, Florida 33301

Telephone: (954) 356-0011 Facsimile: (954) 356-0022

csires@bsfllp.com jhilborn@bsfllp.com Respectfully submitted,

#### LESSER, NEWMAN, ALEO & NASSER LLP

/s/ Michael Aleo

Michael Aleo Thomas Lesser 39 Main Street, Suite 1 Northampton, MA 01060 Telephone: (413) 584-7331 Facsimile: (413) 586-7076

aleo@LNN-law.com lesser@LNN-law.com

Attorneys for Plaintiff Servicios Funerarios GG, S.A. de C.V.

Attorneys for Plaintiff Servicios Funerarios GG, S.A. de C.V.

# **CERTIFICATE OF SERVICE**

I, Michael Aleo, hereby certify that this document was sent by electronic mail to counsel for Advent International Corporation.

Date: June 5, 2023

/s/ Michael Aleo

Michael Aleo